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OFFICE OF THE COURT OF

BEFORE THE POSTAL RATE COMMISSION WASHINGTON DC 20268-0001

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R-97

DIRECT TESTIMONY OF
PATSY SPEIGHTS (NNA T-2)
ON BEHALF OF
THE NATIONAL NEWSPAPER ASSOCIATION

DIRECT TESTIMONY OF PATSY SPEIGHTS (NNA T-2)

1	My name is Patsy Speights. I am appearing on behalf of the National
2	Newspaper Association, of which my newspaper is a member.
3	I am editor and general manager of the Prentiss Headlight, a weekly
4	newspaper located in Prentiss, Mississippi. The purpose of my testimony is to
5	demonstrate to the Postal Rate Commission the hardships placed upon a small
3	newspaper when mail delivery fails. I will cite two illustrative examples and will also
7	provide some information about subscribers' complaints.
3	Prentiss is in south central Mississippi, approximately 120 miles north of the
9	Gulf of Mexico and 60 miles south of Jackson, the Mississippi state capital.
10	The Headlight is published on Wednesdays. The newspaper is the primary
11	source of local information for readers in a 30 square mile area. Most of my readers
12	are engaged in manufacturing and industrial jobs.
13	The Headlight is owned by Prentiss Publishers, Inc., a subsidiary of the Daily
14	Leader in Brookhaven, MS. The Jacobs family, who own and operate the Leader and
15	the Headlight, are active community leaders and vigorous defenders of the
16	importance of community journalism. I have placed a copy of a recent issue of the
17	newspaper on file as NNA Library Reference #3.
18	Besides me, the Headlight staff consists of one full-time person and six part-
19	time persons. My responsibilities cover the full gamut of activities needed to produce
20	a weekly newspaper for a small community. I write the news stories, sell and
21	compose the ads, take pictures, paginate and pasteup copy, haul the pages to the

printer, sort the mailed copies, bundle them, prepare mailbags and deliver the mail to the post office. In addition, I manage our corporate finances, represent the Headlight in our small town, supervise our small staff and provide an attentive ear to residents who drop by to visit about local concerns.

Our total paid circulation as of Nov. 5, 1997, was 2,665, of which 1,102 are entered at the Prentiss delivery office, ZIP Code 39474. Of that total, 312 pieces are entered at the DDU level, 294 pieces at the all-others level and the rest are mailed out of the trade area. The balance of our paid circulation is delivered by our own carriers.

Our newspaper performs a number of worksharing functions to comply with regulations, save money and improve our delivery. We have a software package that breaks out the ADC, 3/5 digit, basic, DDU and in-county levels and prints our mailing statements (3541R).

The weekly report from our software yields information in a format to correspond to bag labels--which themselves create a new difficulty for us because it often takes 4-6 weeks to receive new labels from USPS. In that case, I hand address the label. This has been a problem at times when the postmaster was unsure of the proper sorting for the most direct destination.

We have chronic and persistent problems in achieving consistent mail service for our readers, particularly in mail destined for addresses outside our county. My appearance before the Rate Commission is to demonstrate the lengths to which we must go to see that our mail reaches our readers.

In a normal week, we deliver the newspaper mail to Prentiss by 2 p.m. on Wednesdays. We load the bundles ourselves onto flat carts, with the DDU copies on one cart, the copies for Carson (MS) office 39427 on another cart and Bassfield (MS) 39421 on a third and the rest of the mail on yet another flat cart. We drop the mail on a dock and push it ourselves into the appropriate rooms in the post office. A contract driver picks up the carts destined for other offices and delivers them to those offices.

Last year, at the height of the Christmas shopping season, we had a lesson in how fallible the system is.

We dropped our papers on the dock as usual. The contract driver picked them up.

But he failed to drop them off at Bassfield or Carson.

The people in the Bassfield and Carson post offices know that my papers should be in their offices by Thursday morning. But during this week, on December 19, 1996, a Bassfield Post Office employee phoned to say my papers did not arrive. Shortly after that I got a similar call from Carson. I began to worry about my Christmas edition. I knew the carts had been picked up from Prentiss, but where were they?

Finally, the mystery was solved. The Bassfield employee called to say she had seen the driver's truck parked in back of her office and it appeared the driver had simply neglected to unload them. My papers were still on the truck.

In order to get my papers delivered, I had to locate that truck myself. I got permission to take the Bassfield postmaster to open the door of the contract carrier's truck, which was parked outside the Bassfield office, so I could retrieve my own mail.

I found it all on the carrier's truck and wound up dropping it all off myself at the necessary stops along the usual routes. No one offered a rebate on my postage. And my rural readers missed their paper for an additional day--at a very bad time of the year. Needless to say, my advertisers were not very happy with me.

This unusual drop shipping exercise was a one-time occurrence, but service problems in general are far from unusual.

One of our most important towns is New Hebron, Mississippi, 39140. I have 41 subscribers there. Most of them live within our county. They expect next-day delivery, same as our other area subscribers do. But New Hebron post office is in the next county, so these subscriber copies are technically regular rate mail.

I used to drop my mail for New Hebron at Prentiss just as I do the mail for Bassfield and Carson. But after reclassification, delivery complaints began to soar. The postmaster suggested we change from brown bags to green ones and we did, but delivery did not improve. Then he suggested orange bags and we switched, but delivery did not improve. Finally we were told to put our papers in a box with a green lid. The postmaster hand-taped a message to the lid: Expedite. Do Not Open. Deliver Direct to New Hebron, Mississippi 39140. That didn't work either. It is clear to me that the mail doesn't care what color it travels in: the problem is where it has to go to get to New Hebron.

Before reclassification, the New Hebron mail left Prentiss and went to
Hattiesburg about 40 miles away. After reclassification, the route changed from
Prentiss to Hattiesburg to Gulfport, down to New Orleans and then back again after it
is sorted in the New Orleans ADC. Those newspapers travel further in a week than I

do in some years. And the ironic thing is that New Hebron is only 18 miles from

Prentiss. In fact, I have subscribers less than five miles from my door who are served

by Rt. 1 New Hebron. They just happen to be served by a post office in another

county, so their newspapers have to go around Carter's barn to get to them.

Eventually, the situation became intolerable. Now, every Wednesday I drive 18 miles to New Hebron and back again and I enter those copies through exceptional dispatch directly at New Hebron. Because of the rural roads, it takes about 45 minutes to get the mail delivered to the New Hebron post office and make it back to my home 19 miles away. This is at the end of a long 12 hour day. But the Postal Service offers no discount for this extra effort or cost under the present rules. My only satisfaction is that my New Hebron readers now receive their paper on time.

My specific problem with the Bassfield mail may have been an unusual one, although delayed delivery is certainly not atypical. But the New Hebron situation is one that I believe many small town publishers face. With the new rules for sacking and packaging for Periodicals, our newspapers have traveled widely--but our service has declined.

The final concern I would like to raise with the Commission is about my various readers scattered around the country.

It may seem to some business people that these out-of-town readers are not very important. They don't shop in our stores. They don't attend civic events listed in the paper. They may not visit my office with news very often. But they are important to our mandate as a local newspaper. Sometimes they are senior citizens with seasonal homes, or college students whom we certainly do wish to encourage as

future readers. Sometimes they are former residents, or people on temporary posts
who will return to Prentiss. In every case, they are people who provide some small
revenue stream for our little paper by paying for an annual subscription at \$28 a year.
When we lose them, we lose more than money. We lose loyalty and a part of our
franchise. And our out-of-town readers lose a service that helps them stay connected

to a place and to people who are important to them.

Delivery to these people has long been a problem for some reason. But the complaints I've received in recent years clearly are on the increase. To test the depth of the problem, I put a flyer into every mailed newspaper in June 4, 1997. I asked subscribers to tell me when they received that edition. I am attaching their responses to my testimony as my Exhibit 1.

Among the things I learned from my readers was that it actually took 14 days for the Headlight to reach Kettering, Ohio, and nine days to get to Richmond, CA. I learned I had 67 people who were owed an apology for poor service. I consider those readers to be readers at risk. I am frustrated that I can do so little to satisfy these people.

My newspaper spends approximately \$56,000 a year with USPS for delivery of our newspaper and our weekly shopper. To the Postal Service's \$52 billion enterprise, that isn't much. But to our newspaper it is a lot. But it is wasted money if the newspaper is not delivered on time. With our small market, every reader is an important part of the business.

The amount of home delivery that we handle with our own carriers came about as a direct result of rising postal rates. At one time, virtually all of our 2,665 copies

would have been mail-delivered. But carrier delivery isn't possible for us for copies that are delivered just outside the in-town area. We must rely upon the Postal Service as our circulation manager. And we certainly cannot hand-carry a copy to Kettering, Ohio, although I sometimes wonder if we couldn't get it there faster if we did.

The Postal Service has been an important business partner to us. Our relationship with our local postmaster is excellent and I feel the Postal Service as an institution is a vital part of our American democracy. It does feel to me as if the Postal Service has gotten too grand for us in recent years—so busy with its major accounts and its new machines that it has forgotten our little newspapers. But our forebears were the publishers who helped this system of universal delivery come into being and I believe that universal delivery should remain the Postal Service's primary concern.

I am willing to do my part to sort the mail and prepare it according to all of the rules, even as the rules have become increasingly complex. But when I am doing the work for the post office, I believe I should be compensated for that work. I am paying the Postal Service the same rate for my newspapers delivered to New Hebron as I am for newspapers delivered to Hattiesburg, but to reach New Hebron I am buying gas, depreciating my car and spending my own time. Those contributions are significant to me and to my business. They should be recognized by the Postal Service.

Therefore, I request that the Postal Rate Commission consider recommending a discount for these short-haul newpapers that are entered through exceptional dispatch. Furthermore, I hope the Commission will take into account the difficulties plaguing Periodicals mail delivery around the country when it determines our rates.

- 1 Even with the moderate increases proposed in this case, small newspaper publishers
- are overpaying when they receive no value because angry subscribers drop the
- paper. The value of this service has declined for us in recent years and I request that
- 4 the Commission acknowledge this problem in its recommendations to the USPS
- 5 Board of Governors. I request a moderation of our rates because of these problems.
- 6 I believe strong encouragement from the Commission will help the Postal Service
- 7 maintain its determination to address these problems and help us to satisfy our
- 8 readers.

DECLARATION

I, Patsy Speights, declare under penalty of perjury that the foregoing testimony is true and correct, to the best of my knowledge, information and belief.

Dated: Jr. 23, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Commission's Rules of Practice.

Senny Boone

National Newspaper Association Suite 550 1525 Wilson Boulevard Arlington, VA 22209

Dated: 12 - 30 - 92

NNA T-2

EXHIBIT 1

Prentiss Headlight, Prentiss MS
Subscriber Complaints
Pages 1-24

trying to find a solution to the problem according to the results and discuss them with the Post	al Service.
On what date did this edition (June 4) arrive	19 June 13
How many days usually pass between the preceive the edition?	publication date and the date you
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Address: 15311 DIAMORGI	4N Phone 1-713-466-8899
City: HOUSTON State To	2x 45 Zip 27040
Please return this poll to: The Prentiss Head P.O. Box 1257 • Pro	light / Attn: Patsy Speights entiss, MS 39474
OR Fax to (601) 7	92-4222
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Address: 7039 Cross Timber LN. Phone 901-755-8715 City: Memphis State TN. Zip 38125
Please return this poli to: The Prentiss Headlight / Attn: Patsy Speights P.O. Box 1257 • Prentiss, MS 39474
OR Fax to (601) 792-4222 Thank Youl
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City: WALDENA State CA Zip 90249
Please return this poll to: The Prentiss Headlight / Attn: Patsy Speights P.O. Box 1257 • Prentiss, MS 39474
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City: FAYette ville State GA zip 302/4
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City: Manherer State Fr Zip 70448
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Name: BILLY C. GEIGER
Address: 11057 GLEW WATTS RD Phone(504) 261 4220
City: BATTON ROUGE State LA. Zip 708/8
Please return this poll to: The Prentiss Headlight / Attn: Patsy Speighte
P.O. Box 1257 • Prentiss, MS 39474
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	FORD LANE Phone 915) 821-3790 TEXAS ZIP 79924
Please return this poll to: The Prentiss P.O. Box 125	Headlight / Attn: Patsy Speights 7 • Prentiss, MS 39474
OR Fax to	(601) 792-4222
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Our mail subscribers sometimes tell us of poor or erratic delivery of their newspaper. We are trying to find a solution to the problem so you get your Prentiss Headlight on time. We will gather the results and discuss them with the Postal Service.
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city: CLARKSVILLE State TN. zip 37043
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City: Apple Valley State CA. Zip 92307
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How many days usually pass between the publication date and the date you receive the edition?
Name: Jim DAUIS
Address: 416 MARSeille DR. Phone 317-517-3765
City: <u>Hurs</u> T State TX zip <u>7605 9</u>
Please return this poli to: The Prentiss Headlight / Attn: Patsy Speights P.O. Box 1257 • Prentiss, MS 39474
OR Fax to (601) 792-4222. Thank You!

Our mail subscribers sometimes tell us of poor or erratic delivery of their newspaper. We are trying to find a solution to the problem so you get your Prentiss Headlight on time. We will gather, the results and discuss them with the Postal Service.
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City: Milwanker State WIS, Zip 53206
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Page 6

Ourdoors 10/28/97 5:28 PM Page 2 (1,3)

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Name: (CNtra) L. Walker
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City: Aloftlinloods State Mo Zip 63/21
Please return this poli to: The Prentiss Headlight / Attn: Patsy Speights P.O. Box 1257 • Prentiss, MS 39474
OR Fax to (601) 792-4222
Thank You!
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OR Fax to (601) 792-4222
Thank Youl

Our mail subscribers sometimes tell us of poor or erratic delivery of their newspaper. We are trying to find a solution to the problem so you get your Prentiss Headlight on time. We will gather the results and discuss them with the Postal Service.
■ On what date did this edition (June 4) arrive?
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Name: No/A REID
Address: P. O. Boy 537 Phone 520, 744-9576
City: CORTARO State AZ Zip 85 C52
Please return this poli to: The Prentiss Headlight / Attn: Patsy Speights P.O. Box 1257 • Prentiss MS 39474
OR Fax to (601) 792-4222
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Address: 2003 Wently grand au Phone \$18,358_2/33
city: Duante state Car zip91010_3155
Please return this poil to: The Prentiss Headlight / Attn: Patsy Speights P.O. Box 1257 • Prentiss, MS 39474
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Name: Owend J. Barnes
Address: 2113 Maffett Street Phone (616) 728-1103
City: Muskegan Hs, state Michigan zip 49444
Please return this poll to: The Prentiss Headlight / Attn; Patsy Speights P.O. Box 1257 • Prentiss, MS 39474
OR Fax to (601) 792-4222
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Address: 2826 Willow Wood Circle Phone 912-244-0804
City: Valdosta State Gq. Zip 3/602
Please return this poll to: The Prentiss Headlight (Attn. Patsy Speights) P.O. Box 1257 • Prentiss, MS 39474
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Name: C. G. CRAiG
Address: P.O. Box 18 Phone 601-829-2841
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When are you receiving your Prentiss Headlight?

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Please return this poll to:	The Prentiss Headlight / Attn: Patsy Speights P.O. Box 1257 • Prentiss, MS 39474
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Address:
City: Newhalron State MS Zip 38140
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■ On what date did this edition (June 4) arrive? 6-6-77
■ How many days usually pass between the publication date and the date you receive the edition? Somethys. 3 20 4 Days
Name: Longe Drowny.
Address: 14/1 Box 219 Phone 772-3193
City: New Hebron State Miss zip 39/90
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■ How many days usually pass between the publication date and the date you receive the edition? at Least 2 or 3 dags. We have gotten if once
Name: Mrs. Ben S/Ater or twice on offer day
Address: RY Box //7 Phone 793 - 4495
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■ On what date did this edition (June 4) arrive?
How many days usually pass between the publication date and the date you receive the edition?
Name: James Booth
Address: R. 3* Bax 146 Phone 797 3507
City Mt Oleve State Ma zip 39/19
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■ How many days usually pass between the publication date and the date you receive the edition?
Name: Kafus Louis 1-1911
Address: Re 3 Box 1-5.5 Phone 601-797-4941
city: Mt, Olive State MS Zip 39119
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Name: Estella Pariffith
Address: Rt. 3, Box 158 Phone 797-4960
city: Mt. Qine State on S. Zip 29119
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■ On what date did this edition (June 4) arrive? Thursday June 5
How many days usually pass between the publication date and the date you receive the edition? Received some times on Thursday, Honday, Monday
Name: Mrs. John N. Miller, Jr
Address: 183 Tennyson Care, Phone
City: Picayuse State M5 Zip 39466
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Address: 3905 50th St Phone 485 244)
City: Musidian State MS Zip 39305
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How many days usually pass between the publication date and the date you receive the edition?
Name: The Woods To David Quere Ellen Sinclair June
Address: 408 Win Lover Carcle Phone 243-4338
City: Menden State May ZID 39305
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Name: Vesa R Watson	
Address: Af Boy 332	Phone 943 8154
City: Bassfula \ State MS	zip_ <u>3?_2(</u>
Please return this poli to: The Prentiss Headily P.O. Box 1257 • Pren	pht / Attn: Patsy Speights
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Name: Thelma Holland	50.11
Address: P.O. Boh 56	Phone 943-5946
City: Bassfild y State M	<u>zip 3940-1</u>
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Name: WILMA L. CLIBUK	24 -
Address: ROSITE 2 BOX 444	
city: SILVER CREEK State MI	
Please return this poli to: The Prentiss Headilg P.O. Box 1257 • Pren	ght / Attn: Patsy Speights tiss, MS 39474
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■ On what date did this edition (June 4) arrive?
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Name: Marie Sylves
Address: Maile I Sup W
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Name: KALDH M. FORTENBERRY, M.D.
Address: 27 / 30/ 580 Phone 792-7456
City: Onkvake State MS Zip 37656
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How many days usually pass between the publication date and the date you receive the edition? Alwast Always Just Ove Day
Name: Mu, Ray Branton
Address: At 1 Box 45- A Phone 792-5462
City: Oakible State MS. Zip 37636
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